

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

AMERICAN ALLIANCE FOR
EQUAL RIGHTS, a nonprofit
corporation,

Plaintiff,

v.

Tim Walz, in his official capacity as
Governor of the State of Minnesota,

Defendant.

Civil Action No. 0:24-cv-01748-PJS-JFD

**UNOPPOSED MOTION FOR
LEAVE TO FILE AMENDED
COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15, United States District Court of Minnesota Local Rule 15.1, and with the consent of Defendant, Plaintiff hereby submits this unopposed motion to amend its original Complaint. In support of this motion, Plaintiff states the following:

1. In the course of gathering discovery, Plaintiff has come to no longer rely on Member A referred to in the original Complaint.
2. Plaintiff's counsel informed Defendant's counsel of the possibility of moving to amend the original Complaint to reflect this change during a conference call among counsels and a subsequent status conference held on November 20, 2024.
3. On December 18, 2024, Plaintiff's counsel conferred with Defendant's counsel via email and requested consent to amend the original

Complaint to reflect that Plaintiff no longer relied on Member A for the suit.

4. On December 20, 2024, Defendant's counsel gave written consent to amend the complaint.
5. Under Rule 15(a)(2) of the Federal Rules of Procedure, a party may amend its pleading with the opposing party's written consent.
6. In accordance with LR 15.1(b), a copy of the proposed amended pleading and a redlined version of the proposed amended pleading indicating its changes from the original Complaint are included as attachments to this motion.
7. All parties consent to this motion, and no party will be prejudiced by the requested relief.

Plaintiff respectfully requests that the Court grant this motion.

Dated: December 23, 2024.

Respectfully submitted,

/s/ Brandon C. Beyer

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* *Pro Hac Vice*

CERTIFICATE OF SERVICE

I hereby certify that on December 23, 2024, the forgoing document was filed via the court's electronic filing system, which provides notice of filing to the following:

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/s/ Brandon C. Beyer
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